

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California
public benefit corporation; LAURA
CHAMBERS and her marital community;
WINIFRED MITCHELL BAKER and her
marital community, and DANI CHEHAK and
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

ORDER ON LCR 37 SUBMISSION
REGARDING PLAINTIFF'S
DISCOVERY REQUESTS TO
MOZILLA CORPORATION AND
INDIVIDUAL DEFENDANTS

[PROPOSED]

THIS MATTER having come before the Court upon LCR 37 Submission Regarding
Plaintiff's Discovery Requests to Mozilla Corporation ("Mozilla") and Individual Defendants,
and the Court having reviewed the files and records herein, and being fully advised, **NOW**
THEREFORE,

1. The subject matter and temporal scope of ROGS 2 and 3 to Mozilla are
reasonable to establish how Mozilla treated comparators. Mozilla must produce this information
within 14 days.

ORDER ON LCR 37 SUBMISSION
RE PLAINTIFF'S DISCOVERY
REQUESTS TO MOZILLA CORP.
AND INDIVIDUAL DEFTS. - 1

STOKES LAWRENCE, P.S.
1420 FIFTH AVENUE, SUITE 3000
SEATTLE, WASHINGTON 98101-2393
(206) 626-6000

1 GRANTED _____ DENIED _____

2 2. RFP 2 to Mozilla: Mozilla's consideration of other CEO candidates is directly
3 relevant to its consideration of Plaintiff. Mozilla must produce this information within 14 days.

4 GRANTED _____ DENIED _____

5 3. RFP 6 to Mozilla: the TK Law Report is not privileged. Mozilla must produce this
6 information within 14 days.

7 GRANTED _____ DENIED _____

8 4. Individual Defendants should adhere to the search methodologies they committed
9 to in the ESI Agreement and their prior representations. Individual Defendants must submit their
10 data sources to a vendor for searching, and apply the same search terms and methodologies to
11 their personal data sources, including personal e-mail data, that Mozilla has agreed to apply to
12 their Mozilla-owned data sources.

13 GRANTED _____ DENIED _____

14 5. RFP 9 to Mozilla: Defendant Baker's personal and Mozilla email should be
15 searched for all messages including the term "cancer" over the past ten years. Mozilla must
16 produce this information within 14 days.

17 GRANTED _____ DENIED _____

18 6. Defendants must pay Plaintiff the reasonable fees of \$14,262.50 incurred in
19 compelling the discovery subject to this Motion.

20 GRANTED _____ DENIED _____

21 The material compelled by this order must be produced within 14 days.

DATED _____, 2025

THE HONORABLE RICHARD A. JONES

Presented by:

STOKES LAWRENCE, P.S.

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